Admitted:
California
District of Columbia
New York
Oregon

Law Offices
of
PETER A. CASCIATO
A Professional Corporation

Roundhouse Plaza
1500 Sansome Street, Suite 201
San Francisco, CA 94111
Telephone: (415) 291-8661
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June 18, 1992

FEDERAL EXPRESS/BY HAND

Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW Room 222
Washington, D.C. 20554

Re: Healdsburg, CA MM Docket No. 92-111

Dear Ms. Searcy:

Enclosed for filing in the above-captioned proceeding are an original and six copies of Healdsburg Broadcasting, Inc.'s (a) Petition For Leave to Amend and Amendment and (b) Petition to Enlarge Issues.

Should you have any questions concerning Healdsburg Broadcasting, Inc., please contact the undersigned.

Very truly yours,

Peter A. Casciato

enclosures

cc: Michael & Julia Akana
w/encls.

PAC:sc

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

In re Applications of	)	MM Docket No. 92-111
Deas Communications, Inc.,	)	
et al.	)	File Nos. BPH-910208MB
	)	et al.
For A Construction Permit	)	
For A New FM Station on	)	
Channel 240A	)	
Healdsburg, California	)	

To: Hon. Edward J. Kuhlmann,
Administrative Law

PETITION FOR LEAVE TO AMEND

Healdsburg Broadcasting, Inc. ("HBI"), applicant for a new FM radio station on channel 240A in Healdsburg, California, by its attorney, hereby petitions for leave to amend its application pursuant to Ordering Paragraphs 20 and 21 of the Hearing Designation Order ("HDO") DA 92-577 released May 20, 1992 and Section 73.3514(b) of the Commission's rules. The attached amendment cures the antenna height and contour overlap matters noted in the HDO and also provides the requested envrionmental assessment noted therein. As a result, HBI requests that it be granted leave to file the attached engineering information.

Respectfully submitted,

Peter A. Casciato
A Professional Corporation
1500 Sansome Street Suite 201
San Francisco, CA 94111
(415) 291-8661

Counsel to Healdsburg
Broadcasting, Inc.

June 18, 1992

Healdsburg Broadcasting, Inc. Application
Amendment No. 7
Application No. BPH-910211MB
FM Radio Station on Channel 240A
Healdsburg, CA

Healdsburg Broadcasting, Inc. hereby amends its application to include the attached engineering information required by the Hearing Designation Order in MM Docket No. 92-111.

Julia Akana

Date: June 18, 1992 Julia Akana, Secretary

CERTIFICATE OF SERVICE

I, Peter A. Casciato, certify that the following is true and correct:

I am employed in the City and County of San Francisco, California, am over the age of eighteen years, and am not a party to the within entitled action:

My business address is: 1500 Sansome St., Suite 201, San Francisco, California 94111.

On June 18, 1992, I served the attached of Petition For Leave to Amend and Amendment of Healdsburg Broadcasting, Inc. by causing true copies thereof, enclosed in sealed envelopes with postage thereon fully prepaid, to be placed in the United States Post Office mail box at San Francisco, California, addressed to the following listed people:

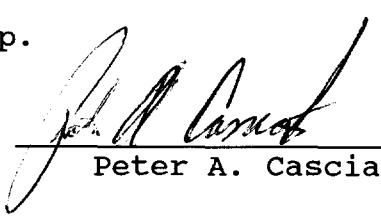
Hon. Edward J Kuhlmann
Administrative Law Judge
Federal Communications Commission
2000 L Street, NW Room 220
Washington, DC 20036
(Federal Express\By Hand)

Larry Miller, Esq.
Mass Media Bureau
Federal Communications Commission
2025 M Street NW Room 7212
Washington, D.C. 20554
(Federal Express\By Hand)

Chief, Data Management Staff
Audio Services Divsion
Mass Media Bureau
Federal Communications Commission
1919 M Street NW Room 350
Washington, D.C. 20554
(Federal Express\By Hand)

Lawrence Bernstein
Brinig & Bernstein
1818 N Street, NW, Suite 200
Washington, DC 20036
Attorney for Deas Communications, Inc.

Jerome S. Silber
Rosenman & Colin
575 Madison Avenue
New York, NY 10022-2585
Attorney for Empire Broadcasting Corp.



Peter A. Casciato

Amendment Engineering Statement

This statement responds to Docket No. 92-111, Hearing Designation Order, paragraph 20, directing Healdsburg Broadcasting, Inc. (HBI) to submit a minor curative amendment to correct antenna height and contour overlap deficiencies, and paragraph 21 requiring an environmental assessment addressing the issue of RF exposure to workers on HBI's proposed tower.

The attached engineering corrects pages 17 and 18 from section V-B, and provides corrected exhibits and maps for the continued use of a directional antenna, utilizing 509 meters Above Mean Sea Level. The actual antenna location and maximum ERP of 480 watts remain unchanged from the original engineering. Likewise, the antenna type, manufacture and location of HBI's transmitter site remain unchanged. The correction enlarges all pertinent contours; area within the proposed 70 dBu contour increases from 1158 to 2000 square Kilometers, and the enclosed population from 84,399 to 90,301 persons (1980 census). Modification of the original directional antenna was required to limit radiation towards KKHI-FM to protect it for a short-spaced requirement of 8 kilometers in accordance with Sections 73.207 and 73.215 of the Commission's rules. Distances to KKHI-FM's protected and interfering contours are based on the Class B maximum of 50 KW at 150 meters HAAT. Further, HBI does not propose to side mount its antenna on the same structure as KMGG (BPH910030IF). KMGG is located on a wooden pole approximately 31 meters away.

Environmental Assessment

The Mt. Jackson communications facility is located on a remote rugged mountain top. No deleterious ecological or environmental effects delineated in Section 1.1307 of the Commission's Rules are evident or will result from the addition of HBI's proposed radiator. A theoretical study was conducted to fully assess the radio frequency power density question.

Empire Communications, owner of the Mt. Jackson communications facility, has supplied a list of all site users located on the same tower HBI proposes to use. Additionally, KMGG-FM, as already noted, is located on a separate structure. Figure 2 summarizes a power density hazard calculation study showing the theoretical worst-case maximum power 100% duty cycle contribution from all contributors except HBI. The maximum ERP from each antenna was assumed to be isotropically radiated to ensure an absolute worst-case upper bound. Most of the existing antennas are vertically polarized non-directional low power systems multiplexing several users through RF power combiners. The aggregate result concludes that fields 54.3% of those allowed under ANSI C95.1-1982 would be present at the base of the proposed tower if all users transmitted simultaneously with maximum isotropic ERP. The addition of HBI's 2-bay radiator would contribute an additional 14.3% to this total, assuming it too were isotropically radiating at its maximum ERP of 0.480 KW. Based on a more realistic estimate employing the manufacturer's calculated vertical radiation characteristic, an additional contribution of less than 1% is expected at the tower base. Figure 3 summarizes the proposed 2-bay radiator's expected far-field power densities using this vertical radiation characteristic [see Exhibit-3 pages 3 and 4 for basis].

Figure 2. Calculated worst-case power density contributions referred to base of the proposed common tower.

Freq. [MHZ.]	Licensee	ERP [Watts]	Antenna	Height [m]	Pol. Factor	Erel [V/V]	OST-65 Equation	S [uW/cm2]	ANSI Sref [uW/cm2]	ANSI [%]	Notes
43.200	Cook Paging Inc.	90	Vertical	10.7	1.0	1.0000	4	26.4	1000	2.64	1
43.440	Korbel Inc.	90	Vertical	5.5	1.0	1.0000	4		1000		1
155.550	Sweetwater Utility	25	Vertical G.P.	3.1	1.0	1.0000	4	86.9	1000	8.69	1
451.725	Korbel Inc.	140	Vert. combiner	13.4	1.0	1.0000	4	26.1	1506	1.73	1
460.700	Mark West Schools	140	Vert. combiner	13.4	1.0	1.0000	4	26.1	1536	1.70	1
460.825	Carlile & Assoc.	140	Vert. combiner	13.4	1.0	1.0000	4	26.1	1536	1.70	1
463.850	TeeVax	180	Vert. combiner	13.4	1.0	1.0000	4	33.5	1546	2.17	1
463.950	Sonoma County Pump	120	Vert. combiner	13.4	1.0	1.0000	4	22.3	1546	1.44	1
462.900	PacWest Paging	600	Vertical	23.2	1.0	1.0000	4	37.2	1543	2.41	1
462.975	Sonoma Cnty. Life Sup.	140	Vert. combiner	13.4	1.0	1.0000	4	26.1	1543	1.69	1
464.500	Manuel Bros. Const.	50	Vert. combiner	13.4	1.0	1.0000	4	9.3	1548	0.60	1
464.200	Young Am Homes	50	Vert. combiner	13.4	1.0	1.0000	4	9.3	1547	0.60	1
464.025	Victor Residential	50	Vert. combiner	13.4	1.0	1.0000	4	9.3	1547	0.60	1
851.2125	Sonoma Cnty. Life Sup.	110	Vert. combiner	29.3	1.0	1.0000	4	4.3	2837	0.15	1
851.6875	Empire Communications	320	Vert. combiner	29.3	1.0	1.0000	4	12.5	2839	0.44	1
856.6875	" "	320	Vert. combiner	29.3	1.0	1.0000	4	12.5	2856	0.44	1
857.6875	" "	320	Vert. combiner	29.3	1.0	1.0000	4	12.5	2859	0.44	1
858.6875	" "	320	Vert. combiner	29.3	1.0	1.0000	4	12.5	2862	0.44	1
859.6875	" "	320	Vert. combiner	29.3	1.0	1.0000	4	12.5	2866	0.44	1
860.6875	" "	320	Vert. combiner	29.3	1.0	1.0000	4	12.5	2869	0.43	1
929.4125	Comtech Paging	440	Vertical	29.3	1.0	1.0000	4	17.1	3098	0.55	1
954.300	Empire Communications	75	1.83 m dish	11.6	1.0	1.0000	4	18.6	3181	0.59	1
CH249A	KMGG-FM, BPH910930IF	2040	2-Bay CPOL	14.2	2.0	1.0000	4	117	1000	11.7	1,2

Notes

1: Worst-case isotropic radiator assumed.

2: Radiator located on wooden pole approximately 31 meters away on a bearing of 310 degrees.

ANSI C95.1-1982: S reference = 1000 [uW/cm^2]

OST Bulletin No. 65 Equation-3 used for calculation of S
Ground Reflection Factor = 1.6 (EPA)
Polarization factor = 2 [V/V] for Cpol with zero ellipticity
ERP = 0.480 [KW]
Height = 14.2 [m]

Antenna Type: Jampro JMPC, 2-bays

Elevation [deg.]	Erel [V/V]	S [uW/cm^2]	ANSI [%]	Radius [m]
0.0	1.000	-	-	Horizon
-5.0	0.952	6.84	0.68	162.0
-10.0	0.835	3.34	0.33	80.5
-15.0	0.649	4.49	0.49	53.0
-20.0	0.434	3.50	0.35	39.0
-25.0	0.211	1.26	0.13	30.5
-30.0	0.000	0.00	0.00	24.6
-35.0	0.178	1.70	0.17	20.3
-40.0	0.307	6.20	0.62	16.9
-45.0	0.395	12.4	1.24	14.2
-50.0	0.442	18.2	1.82	11.9
-51.0	0.444	18.9	1.89	11.5
-52.0	0.445	19.6	1.96	11.1
-53.0	0.444	20.0	2.00	10.7
-54.0	0.442	20.3	2.03	10.3
-55.0	0.439	20.6	2.06	9.9
-56.0	0.435	20.7	2.07	9.6
-57.0	0.430	20.7	2.07	9.2
-60.0	0.408	19.9	1.99	8.2
-65.0	0.365	17.4	1.74	6.6
-70.0	0.311	13.6	1.36	5.2
-75.0	0.246	8.98	0.89	3.8
-80.0	0.178	4.84	0.48	2.5
-85.0	0.139	3.05	0.31	1.2
-90.0	0.100	1.59	0.16	0.0

Figure 3.
Predicted far-field power densities for proposed antenna

I conclude from this prima facie study that hazardous fields do not exist anywhere on the ground prior to or after the addition of HBI's proposed 2-bay radiator. Occupational safety will be insured by coordinating with the site user so any authorized tower work will be done with HBI's transmitter turned off. As a warning to the general public, radiation hazard signs will be clearly posted at the base of the proposed tower.

By Stephen C. Petersen
Stephen C. Petersen, P.E.
June 11, 1992

Section V-B - FM BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. _____ ASB Referral Date _____ Referred by _____

Name of Applicant

Healdsburg Broadcasting, Incorporated (amendment)

Call letters *(if issued)*	Is this application being filed in response to a window? ☐ Yes ☒ No If Yes, specify closing date: _____

Purpose of Application: *(check appropriate box(es))*

- ☒ Construct a new (main) facility
- ☐ Construct a new auxiliary facility
- ☐ Modify existing construction permit for main facility
- ☐ Modify existing construction permit for auxiliary facility
- ☐ Modify licensed main facility
- ☐ Modify licensed auxiliary facility

If purpose is to modify, indicate below the nature of change(s) and specify the file number(s) of the authorizations affected.

- ☐ Antenna supporting-structure height
- ☐ Effective radiated power
- ☐ Antenna height above average terrain
- ☐ Frequency
- ☐ Antenna location
- ☐ Class
- ☐ Main Studio location
- ☐ Other *(Summarize briefly)*

File Number(s) BPH-910211MB

1. Allocation:

Channel No.	Principal community to be served:		
	City	County	State
240	Healdsburg	Sonoma	CA

Class *(check only one box below)*

☒ A ☐ B1 ☐ B ☐ C3
☐ C2 ☐ C1 ☐ C

2. Exact location of antenna.

(a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark.

Mt. Jackson: 10.2 Km bearing 13.0 deg. True to D90-228 Coordinates

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude	38°	32'	24"	Longitude	122°	57'	39"

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? ☐ Yes ☒ No

If Yes, give call letter(s) or file number(s) or both. _____

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any.

_____

15. Attach as an Exhibit a 7.5 minute series U.S. Geological Survey topographic quadrangle map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the requirements set forth in Instruction V. The map must further clearly and legibly display the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No. 5

16. Attach as an Exhibit *(name the source)* a map which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. 6

(a) the proposed transmitter location, and the radials along which profile graphs have been prepared;

(b) the 3.16 mV/m and 1 mV/m predicted contours; and

(c) the legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population (latest census) within the predicted 1 mV/m contour.

Area 2000 sq. km. Population 90,301

18. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. NA

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license.

19. Terrain and coverage data *(to be calculated in accordance with 47 C.F.R. Section 73.313)*

Source of terrain data: *(check only one box below)*

[X] Linearly interpolated 30-second database [ ] 7.5 minute topographic map

(Source: NOAA)

[ ] Other *(briefly summarize)*

SECTION V-B – FM BROADCAST ENGINEERING DATA (Page 5)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 8 to 16 km (meters)	Predicted Distances	
		To the 3.16 mV/m contour (kilometers)	To the 1 mV/m contour (kilometers)
*			
0	271	14.1	25.1
45	397	17.1	30.2
90	438	17.2	30.4
135	444	10.6	19.3
180	343	11.3	20.1
225	388	16.9	29.9
270	345	16.0	28.2
315	83	7.8	13.8

*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of HAAT.

20. Environmental Statement *(See 47 C.F.R. Section 1.1301 et seq.)*

Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact? ☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311. Exhibit No. NA

If No, explain briefly why not.

See Engineering Statement, Exhibit-1

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name *(Typed or Printed)*	Relationship to Applicant *(e.g., Consulting Engineer)*
Stephen C. Petersen	Consulting Engineer
Signature Stephen C. Petersen	**Address** *(Include ZIP Code)* 9629 Zayante Drive Felton, CA 95018
Date June 11, 1992	**Telephone No.** *(Include Area Code)* (408) 335 - 3115

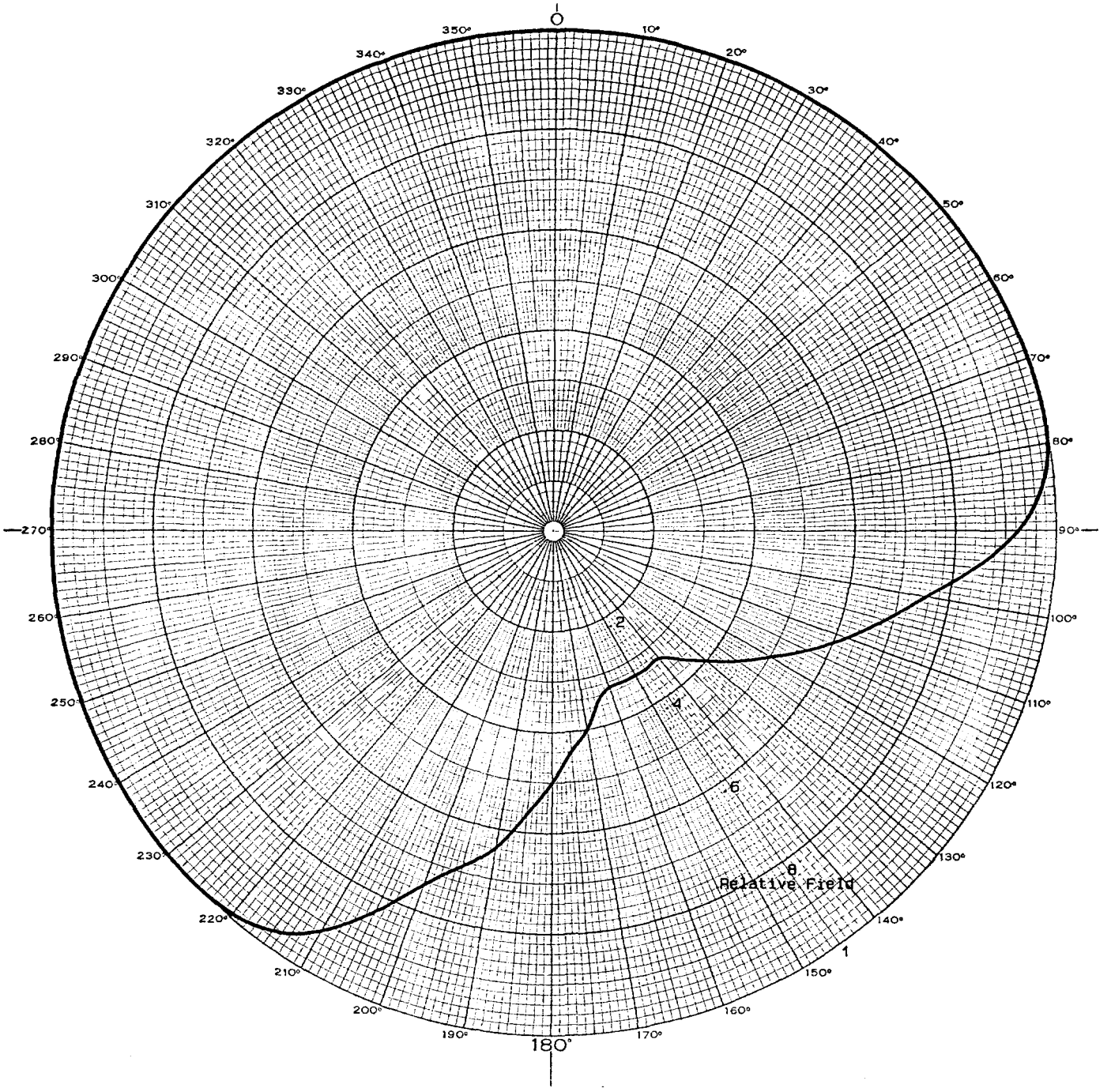
REGISTERED PROFESSIONAL ENGINEER STEPHEN C. PETERSEN No. 13113 Exp. 6-30-93 ELECTRICAL STATE OF CALIFORNIA

Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, Section V-B, question 10, Antenna Data

Proposed Directional Antenna
Horizontal Plane Relative Field Azimuth Pattern

TYPE: Jampro JMPC, 2 Bay DA

POLARIZATION: Circular



Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 340, Section V-B, question 10, Antenna Data

Horizontal Plane Relative Field Tabulation For Proposed Directional Antenna

Antenna Type: Jampro JMCP 2 Bay, DA
Beam Tilt = 0.0 degree
Polarization: Circular; maximum horizontal polarization tabulated

Azim	E-rel	dB-rel	Azim	E-rel	dB-rel	Azim	E-rel	dB-rel
0.0	1.000	0.000	5.0	1.000	0.000	10.0	1.000	0.000
15.0	1.000	0.000	20.0	1.000	0.000	25.0	1.000	0.000
30.0	1.000	0.000	35.0	1.000	0.000	40.0	1.000	0.000
45.0	1.000	0.000	50.0	1.000	0.000	55.0	1.000	0.000
60.0	1.000	0.000	65.0	1.000	0.000	70.0	1.000	0.000
75.0	1.000	0.000	80.0	1.000	0.000	85.0	0.970	-0.265
90.0	0.920	-0.724	95.0	0.840	-1.514	100.0	0.750	-2.499
105.0	0.680	-3.350	110.0	0.620	-4.152	115.0	0.560	-5.036
120.0	0.500	-6.021	125.0	0.450	-6.936	130.0	0.400	-7.959
135.0	0.360	-8.874	140.0	0.330	-9.630	145.0	0.330	-9.630
150.0	0.330	-9.630	155.0	0.330	-9.630	160.0	0.330	-9.630
165.0	0.350	-9.119	170.0	0.400	-7.959	175.0	0.440	-7.131
180.0	0.500	-6.021	185.0	0.565	-4.959	190.0	0.640	-3.876
195.0	0.690	-3.223	200.0	0.750	-2.499	205.0	0.830	-1.618
210.0	0.920	-0.724	215.0	0.970	-0.265	220.0	1.000	0.000
225.0	1.000	0.000	230.0	1.000	0.000	235.0	1.000	0.000
240.0	1.000	0.000	245.0	1.000	0.000	250.0	1.000	0.000
255.0	1.000	0.000	260.0	1.000	0.000	265.0	1.000	0.000
270.0	1.000	0.000	275.0	1.000	0.000	280.0	1.000	0.000
285.0	1.000	0.000	290.0	1.000	0.000	295.0	1.000	0.000
300.0	1.000	0.000	305.0	1.000	0.000	310.0	1.000	0.000
315.0	1.000	0.000	320.0	1.000	0.000	325.0	1.000	0.000
330.0	1.000	0.000	335.0	1.000	0.000	340.0	1.000	0.000
345.0	1.000	0.000	350.0	1.000	0.000	355.0	1.000	0.000

Notes:

1. Tabulation is based on Jampro Corp. supplied data with fields specified every 10.0 degrees, beginning with 0.0 degrees; 45, 135 also specified. Intermediate quantites are interpolated with a cubic spline to produce a smooth curve.

2. Maximum horizontal polarization specified; V-pol less than or equal to H-pol. Final data to be supplied with 302 filing following antenna range measurements.

Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, Section V-B, question 13, Allocation Study

Calculated Distances to Proposed Service and Interference Contours
N 38-32-24, W 122-57-39

Azim (deg)	E-rel (V/V)	Radial ERP (W)	(dBk)	Radial AE(m)	Haat(m)	CONTOUR DISTANCES (Km) F[5050] 60dBu	70dBu	F[5010] 48dBu
0.0	1.000	480.0	-3.188	238	271	25.1	14.1	51.9
15.0	1.000	480.0	-3.188	162	347	28.3	16.0	58.2
30.0	1.000	480.0	-3.188	135	374	29.4	16.6	60.5
45.0	1.000	480.0	-3.188	112	397	30.2	17.1	62.3
60.0	1.000	480.0	-3.188	123	386	29.8	16.9	61.5
75.0	1.000	480.0	-3.188	91	418	30.9	17.6	63.4
90.0	0.920	406.3	-3.912	71	438	30.4	17.2	62.1
105.0	0.680	222.0	-6.573	67	442	26.3	14.8	55.1
120.0	0.500	120.0	-9.208	82	427	22.3	12.5	47.5
125.0	0.450	97.2	-10.123	74	435	21.4	11.9	45.4
130.0	0.400	76.8	-11.146	71	438	20.2	11.2	43.0
135.0	0.360	62.2	-12.062	65	444	19.3	10.6	41.0
140.0	0.330	52.3	-12.817	70	439	18.4	10.0	39.1
145.0	0.330	52.3	-12.817	76	433	18.3	10.0	38.9
150.0	0.330	52.3	-12.817	78	431	18.2	9.9	38.8
155.0	0.330	52.3	-12.817	95	414	17.9	9.8	38.3
160.0	0.330	52.3	-12.817	111	398	17.5	9.6	37.7
165.0	0.350	58.8	-12.306	143	366	17.4	9.6	37.1
170.0	0.400	76.8	-11.146	157	352	18.2	10.2	38.7
175.0	0.440	92.9	-10.319	160	349	19.1	10.7	40.4
180.0	0.500	120.0	-9.208	166	343	20.1	11.3	42.6
185.0	0.565	153.2	-8.147	177	332	21.1	11.8	44.3
190.0	0.640	196.6	-7.064	188	321	22.0	12.4	46.1
195.0	0.690	228.5	-6.411	164	345	23.6	13.3	49.7
200.0	0.750	270.0	-5.686	161	348	24.7	13.9	51.8
210.0	0.920	406.3	-3.912	137	372	28.1	15.9	58.4
225.0	1.000	480.0	-3.188	121	388	29.9	16.9	61.6
240.0	1.000	480.0	-3.188	201	308	26.6	15.1	54.9
255.0	1.000	480.0	-3.188	243	266	24.8	14.0	51.4
270.0	1.000	480.0	-3.188	164	345	28.2	16.0	58.0
285.0	1.000	480.0	-3.188	233	276	25.3	14.2	52.3
300.0	1.000	480.0	-3.188	287	222	22.8	12.8	47.4
315.0	1.000	480.0	-3.188	426	83	13.8	7.8	29.1
330.0	1.000	480.0	-3.188	324	185	21.0	11.7	43.2
345.0	1.000	480.0	-3.188	258	251	24.2	13.6	50.2

Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, Section V-B, question 13, Allocation Study

Calculated Distances to First Adjacent Channel Station KKHI Contours
Based on Class-B 50 Kilowatt ERP at 150 meters HAAT
N 37-41-23, W 122-26-12

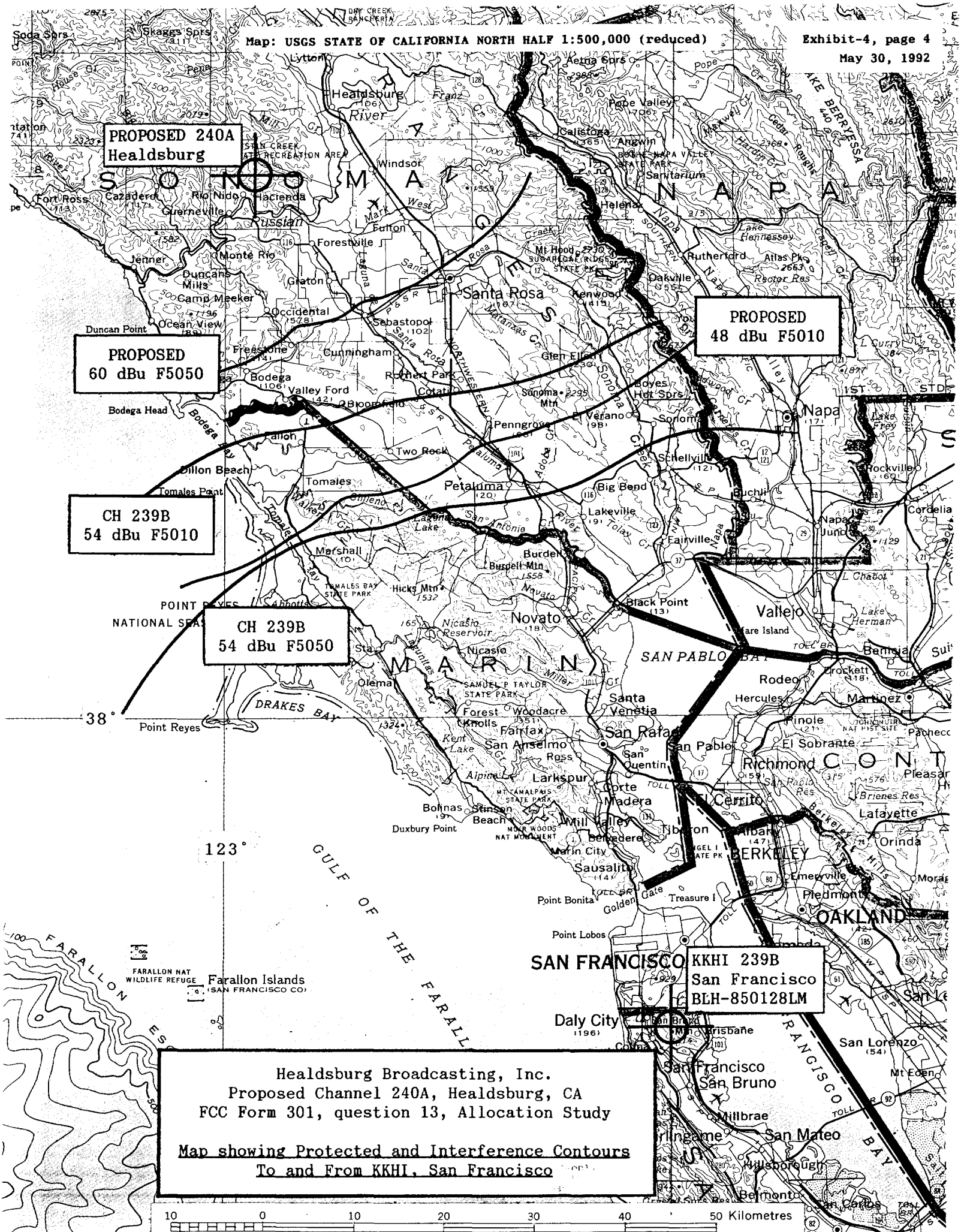
Azim (deg)	E-rel (V/V)	Radial ERP (KW)	Radial ERP (dBk)	Radial AE(m)$_2$	Radial Haat(m)	CONTOUR DISTANCES (Km)$_1$ 54 dBu F[5050]	54 dBu F[5010]
0.0	1.000	50.0	16.993	55	152	65.3	78.4
5.0	1.000	50.0	16.993	48	159	66.2	79.4
10.0	1.000	50.0	16.993	45	162	66.6	79.8
15.0	1.000	50.0	16.993	40	167	67.2	80.5
20.0	1.000	50.0	16.993	32	175	68.1	81.6
45.0	1.000	50.0	16.993	14	193	69.8	83.9
90.0	1.000	50.0	16.993	1	206	71.1	85.5
135.0	1.000	50.0	16.993	11	196	70.1	84.3
180.0	1.000	50.0	16.993	196	11	36.1	45.3
225.0	1.000	50.0	16.993	32	175	68.1	81.6
270.0	1.000	50.0	16.993	12	195	70.0	84.2
300.0	1.000	50.0	16.993	14	193	69.8	83.9
305.0	1.000	50.0	16.993	15	192	69.7	83.8
310.0	1.000	50.0	16.993	18	189	69.4	83.4
315.0	1.000	50.0	16.993	23	184	69.0	82.8
320.0	1.000	50.0	16.993	31	176	68.2	81.7
325.0	1.000	50.0	16.993	45	162	66.6	79.8
330.0	1.000	50.0	16.993	65	142	63.9	76.9
335.0	1.000	50.0	16.993	71	136	63.1	76.0
340.0	1.000	50.0	16.993	81	126	61.5	74.3
345.0	1.000	50.0	16.993	87	120	60.6	73.3
350.0	1.000	50.0	16.993	85	122	60.9	73.7
355.0	1.000	50.0	16.993	72	135	62.9	75.8

Notes:

1. KKHI-FM's licensed RC of 450 m AMSL and 393 m HAAT were used to determine the contour calculation RC of 207 m AMSL = 57 m AMSL + 150 m HAAT. However, using NOAA 30 sec. terrain data, an 8-radial AE of 43 m AMSL results. For purposes of this study, the more conservative licensed AE was utilized.

2. Radial average elevations are based on NOAA 30 sec. terrain data.

Map: USGS STATE OF CALIFORNIA NORTH HALF 1:500,000 (reduced)



Healdsburg Broadcasting, Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, question 13, Allocation Study

Map showing Protected and Interference Contours
To and From KKHI, San Francisco

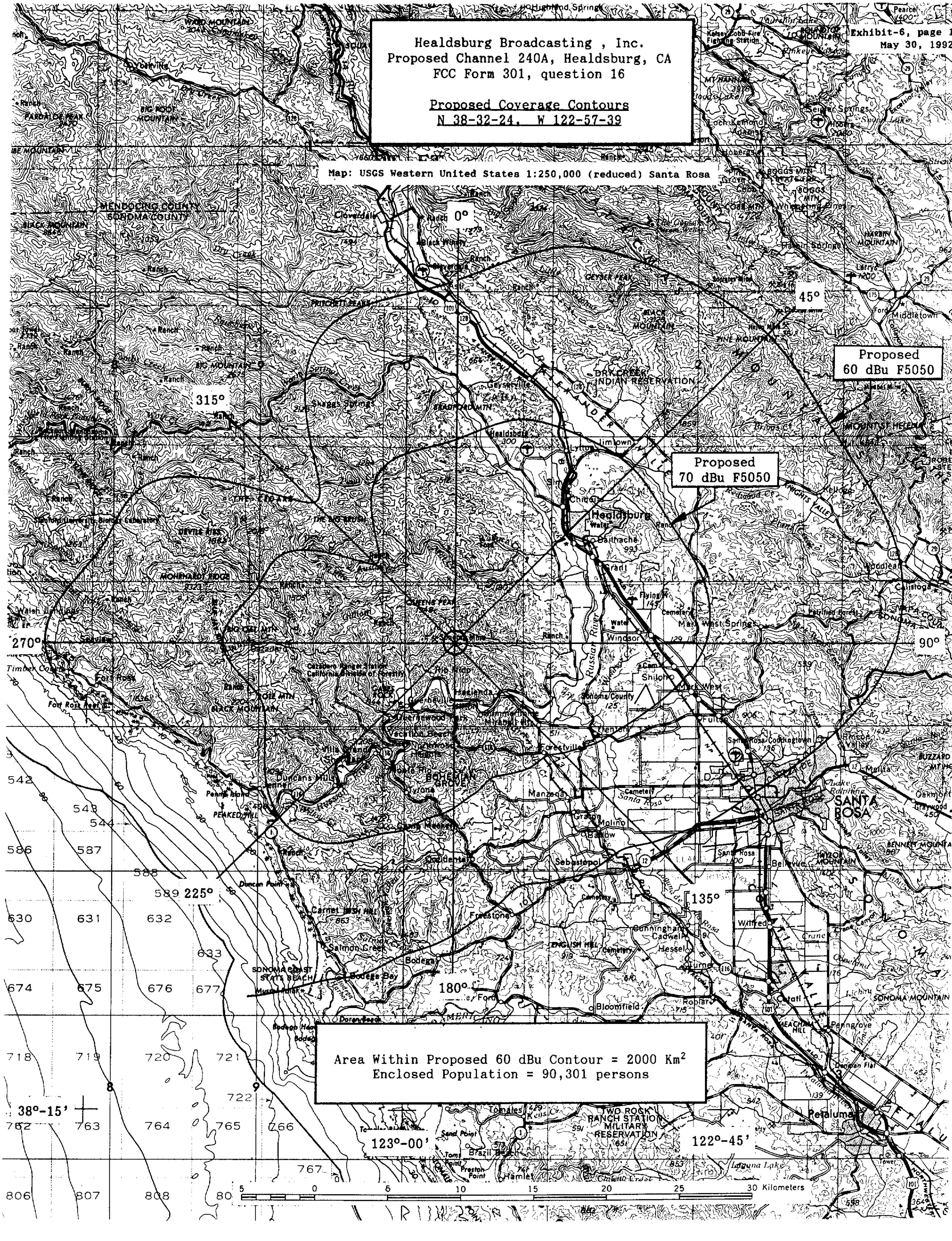


Exhibit-6, page 1
May 30, 1992
Healdsburg Broadcasting , Inc.
Proposed Channel 240A, Healdsburg, CA
FCC Form 301, question 16
Proposed Coverage Contours
N 38-32-24, W 122-57-39
Map: USGS Western United States 1:250,000 (reduced) Santa Rosa
0°
45°
90°
135°
180°
225°
270°
315°
Proposed
60 dBu F5050
Proposed
70 dBu F5050
Healdsburg
SANTA ROSA
Area Within Proposed 60 dBu Contour = 2000 Km²
Enclosed Population = 90,301 persons
38°-15'
123°-00'
122°-45'
30 Kilometers